October 19, 2012

SUPPLEMENT

PERSONAL PERGEONS
2012 OCT 24 PRIZ: 03
OFFICE OF COMMAN

Office of the General Counsel ATTN: Federal Election Commission 999 E Street, NW Washington, DC 20463

Re:

Jamie Wall, Wall for Congress Committee, Wisconsin Jobs Nowl, Inc., and Paula Zellner

File#: MUR6664

Dear Counsel:

I am writing to inform you of relevant developments occurring after submission. The following is sworn to be accurate to the best of my knowledge. I hope my role in resolving this issue is small. However, it is important to our district that fair elections occur. I felt it my civic duty as an attorney, a republican, and a citizen to make this board aware of this issue.

- SERU/WI JOBS NOW! did admit that Zellner was on their payroll until the end of March.
 They provided this information to Fox 11 News, Green Bay Wisconsin. The entire e-mail is provided via camera in the news story. I have not been provided a copy of the e-mail confirming this information.
 - a. FOX11: Video Found the Following Website.

 http://mms.tveyes.com/Transcript.asp?StationID=3240&DateTime=10%2F2%2F

 2012+5%3A02%3A57+PM&Term=%22Reid+Ribble%22&PlayClip=TRUE.

 Exhibit #A.
- 2. Jamie Wall did blame his computer system for creating press releases that are back dated.
 The following media sources have covered the issue. There may be valuable information admitted by Wall in the development of these stories.
 - a. Media Trackers: http://mediatrackers.org/2012/10/03/jamie-walls-rebuttal-of-complaint-ignores-damaging-fact/. Exhibit #B.

- b. NBC26: Video Found the Following Website.

 http://mms.tveyes.com/transcript.asp?StationID=3240&DateTime=10%2F2%2F2

 012+5%3A03%3A10+PM&Term=Reid+Ribble&PlayClip=TRUE. Exhibit #C.
- c. WBAY(ABC) Video Found the Following Website.

 http://mms.tveyes.com/Transcript.asp?StationID=3225&DateTime=10%2F2%2F

 2012+5%3A03%3A38+PM&Term=%22jamie+wall%22&PlayClip=TRUE.

 Exhibit #D.
- d. Post Crescent and Green Bay Press Gazette (printed same article in both): http://www.greenbaypsessgazette.com/article/20121003/GPG010403/3.100
 30175/Appleton-GOP-leader-files-complaint-against-Jamie-Wall-campaign?odyssey=mod|newswell|text|GPG-News|s. Exhibit #D.
- e. WTAQ (Jerry Bader Show): http://wtaq.com/podcasts/jerry-bader-show/brian-sikma-joins-jerry-again-wall-issue/.
- f. WHBY: http://whby.com/index.php/News/WHBY_News/26876. Exhibit #E.
- g. NRCC: http://www.nrcc.org/2012/10/03/jamie-walls-no-good-very-bad-day/.

 Exhibit #F.

Respectfully submitted on October 19, 2012,

Ronald W. Tusler
Attorney-at-Law

WI State Bar No. 1066815

Subscribed and sworn before me this 19 day of OCTOBER, 2012.

Notary Public, State of Wisconsin My commission expires: (1/6//3



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FEC complaint filed against Jamie Wall campaign

Updated, Tuesday, 02 Oct 2012, 5.35 PM CDT Published : Tuesday, 02 Oct 2012, 10:43 AM CDT

Chad Doran, FOX 11 May s

APPLETON - The man running eigelnst incumbent Reid Ribble in the 6th district congressional race could find trouble with the FEC-

A compliant was sent to the Federal Election Commission against Jamie Wall Tuesday.

The allegation are related to his campaign manager Paula Zeliner.

Appleton attorney Ron Tusler, who is also the communications director for the Ordegamile County Republican Party Hays the complaint raises ethical questions about Jamle Walfs campaign.

. Click here to read the full complaint

"In his disclosures he hasn't been paying his campaign manager, that's a big problem," said Tusier.

Tusier says the complaint is hased on a seriod from October 2011 to April of 2012: He claims Zellner: was not paid by his campaign dividing that time period. Tuxier believes Zellner may have still been on the pagoli of his former employer, the Democratic political action committee Wiscons in Jobs Now.

"If there is an explanation for it then lets hear it. If not and Jamie Wall did break federal law. Then he should be prosecuted for it." he said.

In an email to FCK 11, Wesconula Jebs Now lists Zellaer as a political coordinator for the group from May 12, 2011 through March 4th 2012. Wall sags Zellaer started working as campaign manager on March 5th. Wall says he's frustrated by the allegations.

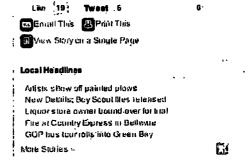
"There's not an ounce of truth to any of this," said Wall-

Campaign announcements dating back to October of 2011 show Zellner's name listed as primary contact. Wall says a computer program meant to keep computer program meant to keep computer program meant to the contact information.

"Right now all of the press releases deting back to October have mycurrent press secretary's name on them, Chris Kelly," said Wall.

Tuster also alleges receipts filed by Walt's campaign; with the government show Zellner making campaign donations dating track to 2011. Ilsting her as campaign mariager, Wall says that is because of recent amended information flut with the FEC.

We are required like any other campaign to update the occupations of our donors, we did that in our delates and when we filed our amended report that updated her information," he said.



All rethinument



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Green Bay Metro News Lakeshore, Door County News North Counties News Tusier says those explanations don't match up with these documents...

"Federal law or FEC regulations have been violated either way."

Now it's up to the Federal Election Commission to decide.

According to the FEC's guidebook, a campaign staffer can work for a PAC. However, there are restrictions on the amount of occasionation between the two.

Reid Ribble's campaign manager Jon Schmeider released a statement about the allegations, saying "The families of northeast Wisconsin deserve an investigation that will bring the full facts to light...This latest incident is just another example of how Jamie Wall has failed to meet the standards that Wisconsinites should expect from their



(i) Post to Facebook

Posting as Atty Ron Tusier (Change) Caltinuant



Barbara Sperrer gings

Another 'scare you' Republican tactic to scrounge votes! Reply * Like * Follow Post * October 2 at 10:38pm



John C Clune ' Top Commenter

despite who and how these charges came about, makes no difference, the law is the law, and it doesn't matter how it came to light, what you are saying is in relation because if I don't get along with someone, I break the law, and that person turns me in, it should be A-OK? this is what you are saying, and it isnt right is it?

normally one brestis the law, then action is taken, one if not then wind? you show termatism, if call bad-your least may have brown inwhen by this humilic mean, but again, it is the law right? or are the mentions of the democratic party above the law as doing as they run, and hold office? be talk was b republican who view in the hiit seat, would you then blame dents? (I strongly doubt it)

Reply - Like - Octainer 3 at 4:20mm



William Tiromas . Top Commeriter : UW-Green Bay

I tried to read your post. Sorry, I could not understand it. Could you rewrite it in a more simple fashion so that this college graduate could understand what you are trying to say? { I'm not making a statement here..., just asking you a question... OK?)

Reply * Like * October 3 at 6:33am



Mike Moroni Top Commenter : Milwaukee School of Engineering

Barbsire, so with practically zero investigation by yourself, you know that this is a fabrication by Tussler? I'll wait to see what comes of the investigation before I pass judgement.

Reply · Like · October 3 at 7:47pm



Ryan Howling . Subscribe . Miwauken, Wisconski What standards does Partie meet? Reply · Like · Follow Post- · October 2 at 8:09pm



Dave Baur Top Commenter Green Bay, Wisconsin ine insets my standards, not being a Liberal Progressive Socialist Democrati Reply : Life: "October 6 at 10:35am

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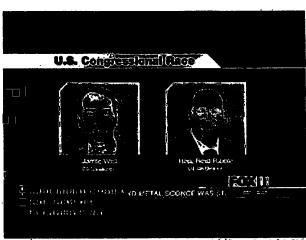
Transcript

<u>Lóa In</u>

WLUK (FOX) - Green Bay, WI Fox 11 News at Five

+ Local Market Viewership: 37,213 Local Publicity Value: \$1,298.06 per 30s

WLUK 19/2/2012 5:02:57 PM: ... case moved to juvenile court, the boys are due back in court next month, more political wrangling on the compaign trail. this time dealing with 8th district congressional candidate jamie wall, wall is the democrat challenging incumbent republican, Reid Ribble, a complaint was sent to the federal elections commission today, against wall, the allegation is related to his campaign manager, fox 11's chad doran has balanced coverage, who is also the communications director for the optagamie county republican party says this federal elections commission complaint mailed out hierary raises ethical quastions about jantie wall's campaign. "in his disclosures he hasn')t heen paying his campaign manager, that's a big problem," tusier says the complaint is based on a period from october 2011 to april of 2012, he claims wall's campaign manager, paula zellner, was not paid by his campaign during that time period. tusier believes zeliner may have still been on the payroll of her former employer, the demogratic puliticul action committee wisconsin jobs now. rm "if tocre is an explanation for it than ters here it, if not and jamie wall did break fedoral law, then he should be prosecuted for it." in an email to fax 11, wisconsin jobs now lists zellner as a political coordinator for the group from may



HAZIPAT SAUDARUI

12, 2011 through march 4th 2012. Wall says zellner started working as campaign manager on march 5th. Wall says he's frustrated by the allegations, jamie: "there's not an ounce of truth to any of this." campaign announcements dating back to october of 2011 show zellner's name listed as primary contact, wall says a computer program meant to keep campaign contact information current has since changed that information. "right now all of the press releases dating back to october have my current press secretary's name on them, chris kelly." tusier also alleges receipts filed by wall's campaign with the government show zellner making campaign donatums dating back to 2011, listing fier as campaign manager, wall says that is because of rocean amended information filled with the fee, jointe: "we are required like any other campaign to update the occupations of our donars, we did that in our database and when me filed our amended report that updated her information." tusier says those explanations don't match up with these documents... ron "federal law or fee regulations have been violated either way," now it's up to the federal election commission to decide, in appleton, chad doran, fox 11 news.> according to the fee's guidebook, a campaign staffar can work for a pac, however, there are restrictions on the amount of coordination between the two. ...

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Jamie Wall's Rebuttal of Complaint Ignores Damaging Fact

October 3, 2012
-For Immediate Release-

MILWAUKEE – On Tuesday a complaint was filed with the Federal Election Commission alleging federal campaign law violations on the part of the Wall for Congress campaign. The complaint alleges illegal campaign coordination between Wall for Congress and Wisconsin Jobs Now! an SEIU front group.

Jamie Wall told 8th District press on Tuesday that Paula Zellner left Wisconsin Jobs Now! on March 4 and became his campaign manager on March 5. He blamed computer and software issues for messing up evidence and showing a several months-long overlap between Zeilner's work for Jobs Now! and her work for his campaign. Federal law prohibits third party groups from coordinating with the political candidates they are attempting to help.

"Wall's easertion that Zeilner never worked for his campaign before Marcis 5 appears to be patently false," said Brian Sikma of Media Trackers. Media Trackers has found that on February 29 Zellner was reimbursed \$284 by the campaign. That means that Zellner was acting on behalf of the campaign in some capacity prior to Wall's self-asserted start date of March 5. "Wall needs to be more transparent about this matter," Sikma said. "There are many unanswered questions, and there is evidence that what he told the press and public may not be true at all."

Media Timokers is a conservative non-partisan watchdog group.

2ND OCT 2012 AT 19:27 | BY COLLIN ROTH

EXHIBIT

UPDATE: FEC Complaint Filed Against Jamie Wall Campaign, Denials Raise More Questions By Collin Roth

On Tuesday, the <u>Appleton Post-Crescent</u> reported that an Outagamie County GOP official <u>filed a complaint</u> with the Federal Election Commission (FEC) against the Jamie Wall campaign (Demograt running in the 8th Congressional District) alleging that campaign manager Paula Zellner worked for a third-party labor group while employed by the campaign. The evidence against Zellner was <u>uncovered by Media Trackers</u> and highlighted by Green Bay radio host <u>lerry Bader</u>.

According to the *Appleton Post-Crescent*, the Wall campaign attempted to dismiss the allegations made in the complaint. Reporter Nick Penzenstadler writes:

A campaign spokesman for Wall denied the allegation. The campaign says Zellner didn't begin work as manager until March 5 and has been paid appropriately since then. In a prepared statement, Wall called the complaint a "political stunt" and said "there's not an ounce of truth in this."

By attempting to dismiss the allegations this way, the Wall campaign opened itself up to a number of unanswered questions that lead one to question the honesty of the campaign.

• If Paula Zellner started working for the Jamie Wall campaign on March 5, 2012, why does Zellner list Jamie Wall for Congress as her emuloyer and Campaign Manager as her position on the Wall campaign's FEC report for a \$150.00 donation recorded on October 3, 2011?

ZELLNER, PAULA	WALL FOR: CONGRESS/CAMPAIGN MANAGER	PORTERFIELD	WI	541 <u>5</u> 9	04/24/2012	\$5	
ZELLNER, PAULA	WALL FOR CONGRESS/CAMPAIGN MANAGER	PORTERITELD	WI	54159	05/04/2012	\$14	• in-kind: Office Supplies
ZELLNER, PAULA	WALL FOR CONGRESS/CAMPAIGN MANAGER	PORTERFIELD	WI	S4159	10/03/2011	\$150	

- Additionally, <u>Milwankee Journal Sentinel</u> columnist Dan Bice also reported that Paula Zellner began working for Wall in October 2011 when he detailed the Racine incident where Zellner and 17 others were cited for protesting in front of private residence. Was Bice wrong about Zellner's tenure with the Wall campaign?
- On January 18, 2012, Zeilner's name was listed as the contact for a Jamie Wall campaign press release. Subsequently, Zellner's name was scrubbed from the press release. Media Trackers was able to recover a cached version. This is a full 48 days before Wall claims Zellner joined the campaign.



Wednesday, January 18, 2012

Jamie Wall Earns Spot in DCCC's Competitive Redto-Blue Program

FOR IMMEDIATE RELEASE: 1/18/2012

Contact: Paula Zeilner at 715-340-6567 or paula@jamiewall.com

• Finally, according to Jamie Wall's FEC reports, Zellner was reimbursed for \$284 on February 29, 2012. Again, this would be previous to the March 5, 2012 date provided by the Wall campaign.

Given the evidence, it is a stretch of the imagination to believe that Paula Zellner was not employed by the Jamie Wall campaign until March 5, 2012.

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26TH SEP 2012 AT 14:31 | BY BRIAN SIKMA

SEIU, Dem SuperPAC Cancel TV. Support for Wall Campaign

By: Brian Sikma

Just days after Media Trackers revealed scrious concerns about possible federal campaign law violations on the part of an SEIU front-group and the Jamie Wall for Congress campaign, Roll Call is reporting that the SEIU and a Democrat affiliated SuperPAC are cancelling television advertising buys originally intended to help boost Wall's campaign. The Media Trackers report highlights a potentially embarrassing situation that could cause outside groups to back away from a toxic campaign.

Paula Zellner, campaign manager for Wall for Congress, appears to have retained a position of influence with Wisconsin Jobs Now! (an SEIU front-group) months after she joined the Wall campaign in October of 2011. As a third-party group that was conducting activities designed to heln Wall end reduce support for his Republican opponent, Wisconsin Jobs Now! was prohibited by federal law from coordinating its activities with the Wall campaign. Campaign finance reports, police reports and social madia accounts all show that Zellner was working for both the third-party group and the campaign, a clear violation of federal election law.

None of the parties involved would comment on or deny the information Media Trackers uncovered. Talk radio in Green Bay did pick up the story and it is not clear if the Wall campaign has responded to press inquiries about the issue.

Third-party groups have become more powerful in reaent election cycles helping to expand the map of competitive races and stretch the spending power of party and candidate committees by reinforcing their message. Federal law strictly bars these outside groups from coordinating with the campaigns they are seeking to assist.

For the SEIU and the House Majority PAC to cancel roughly \$260,000 worth of television ads means that the Wall campaign will need to bolster its own fundraising and media strategy to make up for the lost support. For now the Democratic Congressional Campaign Committee will be proceeding with its television ad buy that, according to *Roll Call*, is scheduled to start on October 9th.

20TH SEP 2012 AT 10:55 | BY COLLIN ROTH

Jamie Wall Press Release Scrubbed Of Controversial Aide?

By Collin Roth

On Tuesday, Media Trackers published an expose on Paula Zellner, a Left-wing radical who has split her time as campaign manager for congressional candidate Jamie Wall and as an activist with the SEIU front group Wisconsin Jobs Now! The evidence Media Trackers uncovered raises serious questions about whether Zellner was being paid simultaneously by the Wall campaign and Jobs Now!, and whether there was any illegal coordination between the Wall campaign and the third party group that is targeting Wall's opponent.

Now a new wrinkle has emerged in the saga of Paula Zellner.

In a cached version of a press release dated January 18, 2012, Paula Zellner is listed as the contact for Jamie Wall's announcement regarding the Democratic Congressional Campaign Committee's Red-to-Blue program.

🚮 😼 i 👸 Sharo

Wednesday, January 18, 2012

Jamie Wall Earns Spot in DCCC's Competitive Rest

FOR IMMEDIATE RELEASE: 1/18/2012

Contact: Paula Zelliner at 715-340-6567 or paula@jamiewall.com

The date on this press release was just 13 days after Zellner was cited in Racine as the organizer of a Wisconsin Jobs Now! rally that picketed and harassed attendees of a fundraiser at a private home. Nevertheless, Zellner had been on Wall's campaign since October 2011. But if one accesses the same press release today, Paula Zellner's name is no long listed as the contact for the January 18, press release. The contact has been changed to Chris Kelly.

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Wednesday, January 18, 2012

Jamie Wall Earns Spot in DCCC's Competitive Red-to-Blue Program

FOR IMMEDIATE RELEASE: 1/18/2012

Contact: Chris Kelly at 920-737-7257 or chris@jamiewall.com

Jamie Wall (WI-08) announced today that he carned a spot on the Democratic Congressional Campaign Committee's (DCCC) highly competitive Red-to-Blue program. He has surpassed demanding fundraising, organizing, and infrastructure goals and skillfully demonstrated to voters that he is a problemsolver who will protect the middle class when elected to Congress.

RED TO BLUE CANDIDATE

"I am honored that so many people in Wisconsin's 8th Congressional District have joined our grassroots campaign to

As Wall attempts to moderate his image and his message, it really is no surprise that he would attempt to hide the Left-wing radical running his campaign.

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18TH SEP 2012 AT 00:36 | BY COLLIN ROTH

EXCLUSIVE: Actions of Wall for Congress Manager Raise Questions of Illegal Coordination



Paula Zellner (Right) organized events for SEIU front-group Wisconsin Jobs Now!, while employed as Jamie Wall's campaign manger.

By Collin Roth

Evidence uncovered by Media Trackers indicates that the campaign manager for Jamie Wall, a Democrat running in the 8th Congressional District, worked for both a left-wing labor organization targeting Wall's opponent Rep Reid Ribble while working for the Wall Campaign. Paula Zellner, a former aide to Sen. Russ Feingold, was employed as Political Coordinator by the SEIU front group <u>Wiscontsin Johs Now!</u> as early as the June of 2011. And in October of 2011, Zellner was hired on as Jamie Wall's campaign manager. But evidence indicates Zellner may have continued at her post with Jobs Now!, raising serious questions of campaign coordination between Jamie Wall and the third party labor group.

From Jobs Now! to Jamie Wall

On June 26, 2011, Paula Zellner was listed as the contact for a Wisconsin Jobs Now! town hall meeting for Rep. Gwen Moore, Rep. Tammy Baldwin, and other local Milwaukee elected

officials. Wisconsin Jobs Now/describes themselves as a "coalition of community groups, neighborhood associations, faith based organizations and labor united in an effort to bring good jobs to Wisconsin now." Jobs Now! is actually part of a well-funded operation by the national SEIU called Fight For A Fair Economy.

By October 2011, Zellnor jumped on Jamie Wall's campaign as campaign manager. But a series of documents and an incident in Racine reveal that long after starting work for Wall, Zellnor was still deeply involved in organizing protests and actions for Jobs Nowl

On October 2, 2011, right around the time that Zellner was hired by Wall, she donated \$250.00 to Rep. Cory Mason (D-Racine). Listed as her is employer is SEIU/Wisconsin Jobs Now with the title of Political Coordinator.

	<u> </u>		1	1	l	l	
10/02/2011	Zeilner, Paula		POLITICAL COORDINATOR	SEIU/WI JOBS	W3034, Twin Creek Rd. Porierield, WI \$4159	\$250.00	\$250.00
000000011	Zublika Manubalo	1.114 Caboonia	perpen	idation		\$25.00	\$60.00

On October 3, 2011, Zellner donated \$150.00 to Jamie Wall and listed her employer as position as Campaign Manager for Jamie Wall for Congress.

MANAGER

WALL FOR

ZELLNER, PAULA CONGRESS/CAMPAIGN PORTERFIELD WI 54159 10/03/2011 \$150

MANAGER

Given the proximity to Zellner's start date with Wall, this is certainly not a smoking gun. According to the GAB, campaigns must simply make a "good faith effort" to determine the employer and position for all donors giving more that \$100.00 in a given year. But on May 5, 2012, a full eight months after joining Wall's campaign, Zellner once again listed Wisconsin Jobs Now! as her employer when she donated to Democrat Assembly candidate Maureen May-Grimm.

L	L	Inner	<u> </u>	1		L	
05/05/2012	Zeilner, Paula.	W3034 Twin Creek Road.	Pottical Coordinator		260 E Highland Ave., Mawaukee,	\$50.00	\$0.00
		Portentield, WI 54159			WI 532U2		
						200	

Incident in Racine

But it is what occurred three months after Zellner joined the Wall campaign that raises the most questions about Zellner's continued involvement with Wisconsin Jobs Now! On January 5, 2012, Paula Zellner and 17 other individuals were cited for violating a city ordinance in Racine when Wisconsin Jobs Now! picketed the private residence of Fred Young, the host for a fundraiser for Rep. Robin Vos and special guest Rep. Paul Ryan. According to the Racine Palice Department, Paula Zellner was not simply an attendee of the protest, but was one of two organizers of the protest along with SEIU organizer and Wisconsin Jobs Now! operative Todd Stoner.

Officer Riemer approached me and asked for direction. At about that time, we were approached by Paula Zellner and Todd Stoner; they were together and had gotten out of a car that parked a short distance away from the limousine, across the street.

This stated they were the event organizers. I explained that we would be creditable with a condition and that should the parties

One attendee of the fundraiser reported to the Racine Police that it was Zellner who was "the main instigator."

photos of the offenders on her digital camera; she showed me the photos and indicated Sellner was the main instigator, she said Zellner was abrasive. (I obtained copies of the photos from her computer on 1/6/12). One of the

The Racine Police report continually notes that Paula Zellner and Todd Stoner spoke for the group and led the demonstration. This begs the question, why would Paula Zellner organize a protest of just 18 people over 200 miles from her home in Porterfield, Wisconsin? The logical conclusion says Zellner was still on the payroll of Wisconsin Jobs Now!



Jobs Now! takes on Ribble

Just 18 days after the incident in Racine, Wisconsin Jobs Now! showed up in Appleton to launch the first of many protests against Rep. Reid Ribble. On January 31, 2012, the Oshkosh Northwestern reported that Todd Stoner, the organizer from Wisconsin Jobs Now! who partnered with Zellner in Racine, coordinated protests against Ribble that demanded an increase in the minimum wage and tax increases.



From January until August 2012, Wisconsin Jobs Now! activists attempted to occupy Rep. Ribble's office in Appleton in a similar fashion to other occupations conducted in the last year against GOP lawmakers. After the most recent occupation in late July 2012, Zellner was quoted in the Manitowoc Herald Times saying "Congressman Reid Ribble doesn't publish a public schedule when he is in Wisconsin, doesn't hold public meetings and kicks constituents out of his office." In this quote, Zellner used the actions of Wisconsin Jobs Now!, an organization she was and still may be involved with, to criticize Rep. Ribble while acting as official spokesman for candidate Jamie Wall.

On Facebook, a group sprung up called Where's Ribble? The group lists Wisconsin Jobs Now! as their website and are known for their cardboard cut-out of Rep. Reid Ribble. The Whure's Ribble group is hosting an event to canvass on behalf of Jamie Wall on September 22.

The close association between Paula Zellner and Wisconsin Jobs Now! while working for Wall is interesting in itself. But once Jobs Now! began targeting Rep Reid Ribble, Zellner's association and continued work for the organization raises serious questions of coordination between the campaign and the third party group.

Furthermore, SEIU Healthcare WI, the source of funding for Wisconsin Jobs Now!, endorsed Jamie Wall as of July 30, 2012. SEIU Healthcare WI shares office space with Wisconsin Jobs Now! and funded the organization to the tune of \$769,023.00 in 2011.

Media Trackers reached out to both Paula Zellner and Wisconsin Jobs Now! to ask for explanations of Zellner's tenure with the organization. Neither were willing to respond.

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\$10



Like 2

Complaint against Wall campaign manager filed with FEC

By: Terry Kovarik



Updated: October 5, 2012

GREEN BAY (WFRV) As campaign workers get the word out about Jamie Wall's congressional campaign, Appleton attorney Ron Tusier is complaining to the Federal Elections Commission about Campaign Manager Paula Zellner.

"So between October 3, 2011 and the beginning of April, she was his campaign manager. But she was getting paid by a PAC," said Appleton attorney Ron Tusler, an official with the Outagamle County Republican Party, but who filed the FEC complaint on his own.

These allegations were first raised on the conservative website "Mediawatshers-dot-com." It was based on

campaign reports that show an October 2011 contribution listing Zellner as campaign manager. That was the same time she was with the Service Employees International Union Political action committee.

But Wall's campaign countered with a pay statement showing she served as campaign manager in early April 2012. Wall says when Zellner's occupation changed, computers changed all records to reflect that.

"There's only one record per person. That changed her occupation then. If you look at the original version of that report that was filled, she's not listed as my compaign manager, because she wasn't," said Wall, Dhmocratic challenger to 8th District Representative Reid Ribble.

Wall and Tusier agree that accountability is needed here.

"If it decides to investigate, I think that will be a sign that it looks like there's something wrong here," Tusler said.

"I'd like to be talking about the issues that matter to real people instead of all this persenal mud slinging when there's not an ounce of evidence for any of it," said Wall.

The FEC will ultimately decide whether there is sufficient evidence to warrant an investigation.

Local 5's Terry Kovarik has the story.

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<u>Loa In</u>

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WBAY 10/2/2012 5:03:38 PM: ...an appleton attorney -who is also the communications director for the outagamie county republicans -- is asking federal election officials to investigate jamie wall's campaign, wall - a democrat - is running against republican congressman reid ribble in the eighth congressional district. live animation matt smith is live in the newsroom with more. malt? the complaint was sent to the federal elections commission today -- asking for an investigation -- questioning whether formic wait's cammain violeted federal election laws, the puestion centers around wall's current campaign manager pasia zeliner -- and the date she started in that position, the campaign says zellner started back on march fifth -- ont day after leaving her position with the non-profit "wisconsin jobs now" -- which is funded in part by s-e-i-u, a major union with political action committees and super pacs -which cannot coordinate with campaigns, but ron fusier, the attorney who sent the complaint, says documents like this



11/2/2017 S-03: 13 PM

show zellner was possibly working for "wisconsin jobs now" -- and at the same time wait's campaign -- when she made a contribution to wall bank in october 2011 listing her as "campaign manager" -- he questions whether "wisconsin jobs now" was paying zellner for campaign work. 7:30 "if there's a reason for his disclosures missing his campaign manager then let's hear it -- hat if there's not a reason - if he did break federal law -- then he should withdraw from his campaign." :42 10:26 "there's not an ounce of truth in any of this." :27. this afternoon in response in his wall shows us two filings with the fac...the initial one in january listing zellner's occupation as "information requested" saying she wasn't working for the campaign. 12:42 "the way the database work is there is one record per person and one occupation per person and when we updated the report - that flowed through." :56 the time-frame in question is between october and april... the campaign says zellner had no involvement...this complaint questions that, each side today nad numerous documents to support their argument, now federal election officials will decide whether to investigate, reporting live in the newsroom, matt smith, action two news, the running mates hit the campaign trail today -- your vote, your vote autmation as both presidential candidate remain out of the public eye... preparing for tomorrow's debate, republican vice presidential candidate paul ryan stopped in three towns during a buo tour through lowe, during a rally in clinton county -- ryan focused on the national debt. ...

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Appleton GOP leader files complaint against Jamie Wall campaign

G.07 AM. Oct 3, 2012 (

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Widen by Nick Ponzenstudier Gannett Wisconsin Media

FILED UNDER Elections: State APPLETON — A spokesman for the Outagamie County Republican Party, acting on allegations made by a conservative watchdog group and a Green Bay radio talk show host, has filed a complaint against the congressional campaign of Democrat Jamie Wall.

Ron Tuslor, an Appleton attorney and member of the county's GOP party, filed a complaint late tast month with the Federal Election Commission. He alleges Wall's campaign manager was working for a political action committee at the same time she was working for the campaign and wasn't being paid by Wall's campaign.

"There's a gap in time that Jamie Wall wasn't paying his campaign manager, and she was on the books for a PAC," Tusier said. "You

can't do that. The PAC can't give any contribution to the campaign."

The complaint will be reviewed by the FEC. It can then choose whether to investigate the claim.

Wall is running for the 8th Congressional District against incumbent Reid Ribble, R-Sherwood.

Wall's campaign manager, Paula Zeliner, was affiliated with the progressive group "Wisconsin Jobs Nowl," the same group that has protested at Ribble's downtown Appleton office in the past. Tusier says she began working for the pampaign la October 2011.

"Even if you take the PAC aspect out of the complaint, Mrs. Zeilner would still be violating the FEC regulations because she was working without getting paid — an in-kind contribution beyond the \$5,000 limit."

A campaign spokesman for Wall denied the



Jamie Wall

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allegation. The campaign says Zeliner didn't begin work as manager until March 5 and has been paid appropriately since then.

In a prepared statement; Wall called the complaint a "political stunt" and said "there's not an ounce of truth in this."

 Nick Penzenstadier writes for The Post-Crescent of Appleton.

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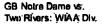
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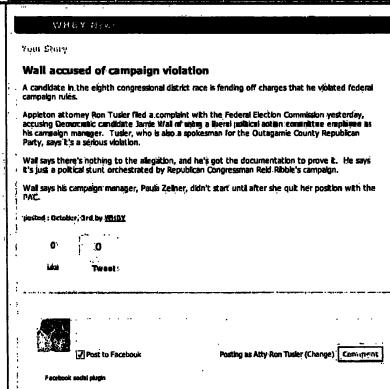
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Publish DateOctober 03, 2012, 2:02 p.m.

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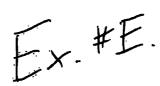
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JAMIE WALL'S NO GOOD VERY BAD DAY...

Andrea Bozek | October 3rd, 2012

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Several bad headlines meet Jamie Wall this morning as his struggling campaign hits another snag. An FEC complaint highlights how <u>Jamie Wall has been accepting illegal corporate</u> contributions. FOX 11 says Wall "could find trouble with the FEC."

Please see a sample of the stories below and the Wall campaign finds themselves in hot water.

Post Grescent: Appleton GOP leader files complaint against Jamie Wall campaign

Ron Tusler, an Appleton attorney and member of the county's GOP party, filed a complaint late last month with the Federal Election Commission. He alleges Wall's campaign manager was working for a political action committee at the same time she was working for the campaign and wasn't being paid by Wall's campaign.

http://www.postcrescent.com/article/20121003/APC010402/310030249/Appleton-GOP-leader-files-complaint-against-Jamie-Wall-campaign?odyssey=tab|topnews|text|FRONTPAGE

WBAY: Republican Files Complaint Against Dem Senate Candidate Jamie Wall

"The complaint asking for an investigation was sent to the Federal Elections Commission on

Tuesday, questioning whether Wall's campaign violated federal election laws. The question centers around Wall's current campaign manager, Paula Zellner, and the date she started in that position... But Ron Tusler, the attorney who sent the complaint, says documents show Zellner was possibly working for Wisconsin Jobs Now at the same time as Wall's campaign, when she made a contribution to Wall back in October 2011 listing her as 'campaign manager." http://www.wibay.com/story/19711725/2012/10/02/republican-files-complaint-agaihst-dem-senate-candidate-jamie-wall

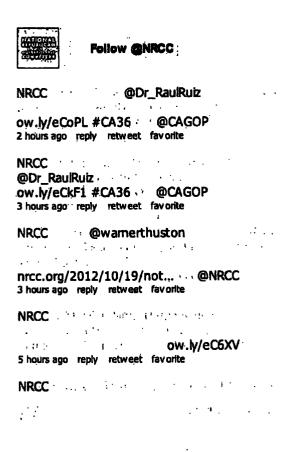
FOX 11: FEC complaint filed against Jamie Wall campaign

"Appleton attorney Ron Tusler, who is also the communications director for the Outagamie County Republican Party says the complaint raises ethical questions about Jamie Wall's campaign. In his disclosures he hasn't been paying his campaign manager, that's a big problem,' said Tusler. Tusler says the complaint is based on a period from October 2011 to April of 2012. He claims Zellner, was not paid by his campaign during that time period. Tusler believes Zellner may have still been on the payroll of her former employer, the Democratic political action committee Wisconsin Jobs Now."

http://www.fox11online.com/dpp/news/local/fox_cities/federal-elections-commission-complaint-filed-against-jamie-wall-campaign

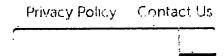
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